

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO.:	1:16-cr-00240
	*		
V.	*		
	*		
	*	CHIEF JUDGE DRELL	
ALAINA STANSELL	*	MAGISTRATE JUDGE PEREZ-MONTES	

BILL OF INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
18 U.S.C. § 1343

I. **BACKGROUND**

1. ALAINA STANSELL is a resident of Alexandria, Louisiana.
2. Cenla Urology Clinic (Cenla) is a medical clinic in Alexandria, Louisiana.
3. ALAINA STANSELL was employed as an office worker at Cenla.
4. Cenla had American Express corporate credit cards for clinic business related expenses. As an office worker, ALAINA STANSELL had access to the American Express credit cards.

II. **SCHEME AND ARTIFICE TO DEFRAUD**

1. Beginning on or about a date unknown but no later than December 1, 2013 and continuing to on or about March 30, 2015, ALAINA STANSELL used her position at Cenla to obtain access to Cenla's American Express credit cards.

2. ALAINA STANSELL used Cenla's American Express credit cards for personal related purchases and expenditures.

3. ALAINA STANSELL used Cenla's American Express credit cards for personal related purchase and expenditures, knowing that she was not authorized or permitted to use Cenla's American Express cards for such personal related purchases and expenditures.

III. SUBSTANTIVE OFFENSE

On or about August 16, 2014, in the Western District of Louisiana, and elsewhere, ALAINA STANSELL, for the purpose of executing the aforesaid scheme and artifice to defraud and to obtain money or property by means of false or fraudulent pretenses, representations, or promises and attempting to do so, did knowingly transmit or cause to be transmitted in interstate commerce, that is from the Western District of Louisiana to American Express located outside the state of Louisiana, certain writings, signs, signals, pictures, and sounds, all in violation of Title 18, United States Code, Section 1343. [18 U.S.C. § 1343].

Respectfully submitted,

STEPHANIE A. FINLEY
UNITED STATES ATTORNEY

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